

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	<u>INDICTMENT</u>
	)	
Plaintiff,	)	
	)	
v.	)	CASE NO. _____
	)	Title 18, United States Code,
MICHAEL BALDWIN,	)	Sections 1028A(a)(1),
	)	1028(a)(4), 1036(a)(4) and (b)(2)
Defendant.	)	and 1343

GENERAL ALLEGATIONS

At all times material and relevant to this Indictment:

1. Defendant MICHAEL BALDWIN resided in Richmond, California, in the Northern District of California.
2. Frontier Airlines is an airline carrier headquartered in Denver, Colorado, in the District of Colorado. Frontier Airlines operates an online website with servers located in Chaska, Minnesota and Minneapolis, Minnesota, both located in the District of Minnesota.
3. Cleveland Hopkins International Airport is an airport as defined by Title 49, United States Code Section 47102.
4. Google LLC is an electronic communications service and/or remote computing service provider headquartered in Mountain View, California, in the Northern District of California.
5. From on or about July 23, 2022, through on or about July 24, 2022, Defendant held an email account that was stored at premises owned, maintained, controlled or operated by Google LLC.

6. A “means of identification” means any name or number that may be used, alone or in conjunction with any other information, to identify a specific individual, including a person’s name, Social Security Account Number, date of birth or state or government issued driver’s license or identification number.

The Scheme to Defraud

7. From on or about July 23, 2022, to on or about July 24, 2022, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant did knowingly devise and intend to devise a scheme and artifice to defraud victim, and to obtain property from victim by means of materially false and fraudulent pretenses, representations, and promises.

8. It was part of the scheme and artifice that Defendant purchase airline tickets online from Frontier Airlines using personal identification information of others and have the airline ticket reservations transmitted into a Google LLC email account controlled by Defendant.

9. It was further part of the scheme or artifice that Defendant use the airline ticket for his personal use and by using fraudulent means of identification to enter pass security into the secure area of the airport.

COUNT 1  
(Wire Fraud, 18 U.S.C. § 1343)

The Grand Jury charges:

10. Paragraphs 1 through 9 of the General Allegations are incorporated herein and realleged by reference.

11. From on or about July 23, 2022, to on or about July 24, 2022, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant MICHAEL BALDWIN devised and intended to devise a scheme and artifice to defraud victim and to obtain property (airline ticket) from Frontier Airlines by false and fraudulent pretenses, representations, and promises.

12. From on or about July 23, 2022, to on or about July 24, 2022, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant, for the purpose of executing and attempting to execute the scheme and artifice to defraud described above, transmitted and caused to be transmitted by means of wire communication in interstate commerce, writings, signs, signals, pictures and sounds, to wit: the following interstate wire transmissions:

<b>Date</b>	<b>Description</b>	<b>Origination/Location</b>	<b>Recipient/Location</b>
07/24/2022	Frontier Airline Ticket Reservation EY7ZFM	Frontier Airlines – Denver, Colorado and Minnesota	Defendant’s Google LLC email account – Mountain View, California and to Defendant located in Northern District of Ohio, Eastern Division

In violation of Title 18, United States Code, Section 1343.

COUNT 2

(Aggravated Identity Theft, 18 U.S.C. § 1028A(a)(1))

The Grand Jury further charges:

13. Paragraphs 1 through 11 of this indictment are re-alleged and incorporated by reference as if fully set forth herein.

14. On or about July 24, 2022, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant MICHAEL BALDWIN, during and in relation to a felony violation of Title 18, United States Code, Section 1343, knowingly possessed and used, without lawful authority, a means of identification of another person, to wit: A.R.G.’s name, knowing that said means of identification belonged to another person, in violation of Title 18, United States Code, Sections 1028A(a)(1).

COUNT 3

(Possession of a Document or Feature With the Intent to Use it to Defraud the United States,  
18 U.S.C. § 1028(a)(4))

The Grand Jury further charges:

15. On or about July 24, 2022, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant MICHAEL BALDWIN, did knowingly possess a false identification document, to wit, a Texas State Driver's License, with the intent such document or feature be used to defraud the United States, in violation of Title 18, United States Code, Sections 1028(a)(4).

COUNT 4

(Entry by False Pretenses Into Secure Area of Airport, 18 U.S.C. §§ 1036(a)(4) and (b)(2))

The Grand Jury further charges:

16. On or about July 24, 2022, in the Northern District of Ohio, Eastern Division, Defendant MICHAEL BALDWIN, did enter or attempt to enter the secure area of the Cleveland Hopkins International Airport by means of fraud and false pretense, in violation of Title 18, United States Code Sections 1036(a)(4) and (b)(2).

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.

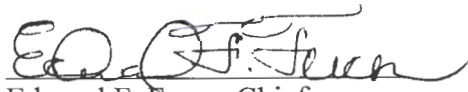
United States v. Michael Baldwin

A TRUE BILL.

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FOREPERSON

MICHELLE M. BAEPPLER  
First Assistant United States Attorney

By:

A handwritten signature in black ink, appearing to read "Edward F. Feran", written over a horizontal line.

Edward F. Feran, Chief  
General Crimes Unit